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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**VICTORIA A. AMELINA, AN  
INDIVIDUAL; AND A.A.; D.S  
AND B.S., EACH INDIVIDUALS  
AND MINORS BY AND  
THROUGH THEIR GUARDIAN  
AD LITEM, VICTORIA A.  
AMELINA,**

**PLAINTIFFS,**

**V.**

**MANUFACTURERS AND  
TRADERS TRUST COMPANY  
AKA M&T BANK, SAFEGUARD  
PROPERTIES, LLC, AND THE  
WOLF LAW FIRM, A LAW  
CORPORATION,**

**DEFENDANTS.**

**Case No: 14-CV-1906-WQH-NLS**

**DECLARATION OF JESSICA R.  
K. DORMAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
LEAVE TO FILE THIRD  
AMENDED COMPLAINT**

**Date: January 19, 2106**

**Time: N/A**

**Room: N/A**

**Judge: Hon. William Q. Hayes**

**No Oral Argument Unless  
Requested by the Court**

1 I, Jessica R. K. Dorman, hereby declare under penalty of perjury that the  
2 following is true and correct:

3 1. I am one of the attorneys for the Plaintiffs Victoria A. Amelina, an individual;  
4 and A.A.; D.S and B.S., each individuals and minors by and through their  
5 Guardian Ad Litem, Victoria A. Amelina ("Plaintiffs") in the above-entitled  
6 action.

7 2. I am licensed to practice law before this court and all California State courts.

8 3. I am a member in good standing with the State Bar of California.

9 4. I have personal knowledge of the information contained in this declaration  
10 and could testify to such if called as a witness.

11 5. I submit this Declaration in support of Plaintiffs' Motion for Leave to Amend  
12 Plaintiffs' Complaint.

13 6. In reviewing the court's order granting Defendants' motions to Dismiss  
14 Plaintiffs' Second Amended Complaint, and discussing the matter with  
15 Plaintiffs, I determined that the Complaint could be amended to add  
16 additional factual allegations to address the deficiencies addressed by the  
17 Court.

18 7. Attached hereto as Exhibit A, is a true and correct copy of Plaintiffs' Proposed  
19 Third Amended Complaint.

20  
21  
22 **Hyde & Swigart**

23  
24 Date: December 16, 2015

25 By: /s/Jessica R. K. Dorman  
26 Jessica R. K. Dorman  
27 Attorneys for Plaintiff  
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